



*Consulting Engineers
and Scientists*

PASTOR, BEHLING & WHEELER, LLC
2201 Double Creek Drive, Suite 4004
Round Rock, TX 78664

Tel (512) 671-3434
Fax (512) 671-3446

June 18, 2010
(PBW Project No. 1352)

Mr. Gary Miller, Remedial Project Manager
U.S. Environmental Protection Agency, Region 6
Superfund Division (6SF-AP)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: Advance Notice of Proposed Supplemental Wetland Sediment Sampling and Related
Activities, Gulfco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller:

As discussed in our previous telephone conversations and pursuant to Section XII, Paragraph 55 of the amended Unilateral Administrative Order for the Site, effective January 31, 2008 (the amended UAO), this letter has been prepared to propose supplemental wetland sediment sampling and related activities to be performed as part of the Remedial Investigation/Feasibility Study (RI/FS) at the subject site (the Site). The proposed activities will be performed by Pastor, Behling & Wheeler, LLC (PBW) on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow), collectively the Gulfco Restoration Group (the Group). In accordance with Paragraph 52 of the amended UAO, I certify that I have been fully authorized by these Respondents to submit these documents and to legally bind these Respondents thereto.

In a letter dated April 23, 2010, the Group proposed to perform remediation of certain wetland sediment areas at the Site as part of a Non-Time Critical Removal Action (NTCRA). The details of that proposal were described in a draft Removal Action Work Plan provided to you on April 29, 2010 and were discussed in a meeting between EPA and the Group on May 17, 2010. In response to that Work Plan and meeting discussions, you provided an e-mail on June 15, 2010 listing several issues to be evaluated as part of an Engineering Evaluation/Cost Analysis (EE/CA) to be prepared for the proposed NTCRA. Among those issues were a requirement that several additional areas with zinc concentrations greater than the Effects Range Low (ERL)-Effects Range Medium (ERM) midpoint be evaluated, and the specification that sampling at the edges of any excavation areas be evaluated.

To address the issues that you identified, and as discussed in my telephone conversation with you on June 16, 2010, the Group would like to perform additional sampling in the vicinity of the originally proposed wetland sediment remediation areas and the additional areas identified by you. The purpose of these sampling activities is to identify the extent of areas potentially requiring remediation, and provide the verification samples for the edges of those areas as requested in your June 15, 2010 e-mail described above and discussed with you on June 16, 2010. Toward that end, collection of samples at the locations shown on attached Figure 1 is proposed. A sediment sample will be collected from the 0- to 6-inch depth interval at each of these locations

using plastic or stainless steel trowels, hand-auger, or a soil core sampler. Sample locations will be documented by GPS equipment.

Field screening of samples for zinc concentrations will be performed using an X-ray Fluorescence (XRF) spectrometer in those areas where zinc concentrations greater than the ERL-ERM midpoint were previously identified. This information will be used to potentially modify sample locations and guide the selection of samples for laboratory analyses. Final confirmation of the extent of zinc concentrations greater than the ERL-ERM midpoint in a specific area will be based on laboratory analyses.

Laboratory analyses will be performed iteratively based on preceding data obtained to identify the extent of chemicals of potential ecological concern (COPECs) in a specific area where the COPECs exceed their respective ERL-ERM midpoint. Initial analyses will be performed on those samples adjacent to the exceedence location with subsequent analyses of more distant samples performed as necessary for COPECs exceeding their ERL-ERM midpoint in the initial samples.

For example, in the vicinity of previous sample NB4SE08, where concentrations of several polynuclear aromatic hydrocarbons (PAHs) and zinc were reported above the ERL-ERM midpoint (see Figure 1), it is anticipated that PAH and zinc analyses will initially be performed on samples from proposed locations 5WSEDA-3, 5WSEDA-4, 5WSEDA-6, and 5WSEDA-10. Analyses of additional samples in this vicinity may be performed based on the PAH and zinc concentrations in these samples. Similarly, should field XRF measurements in one or more of these samples show zinc concentrations significantly higher than the ERL-ERM midpoint, laboratory analyses will not be performed on that sample, but will be performed on samples from the corresponding "step-out" location in the same direction but further distant from NB4SE08. Table 1 summarizes the anticipated initial sample location and analyses. These analyses are subject to modification based on field XRF measurements and/or field observations. Initial sample locations and proposed "step-out" sample locations are shown on Figure 1.

Thank you for the opportunity to submit this information. As indicated in my telephone conversation with you, we are planning to start the proposed activities on June 21, 2010. Please let us know if we may proceed with the proposed activities.

Sincerely,

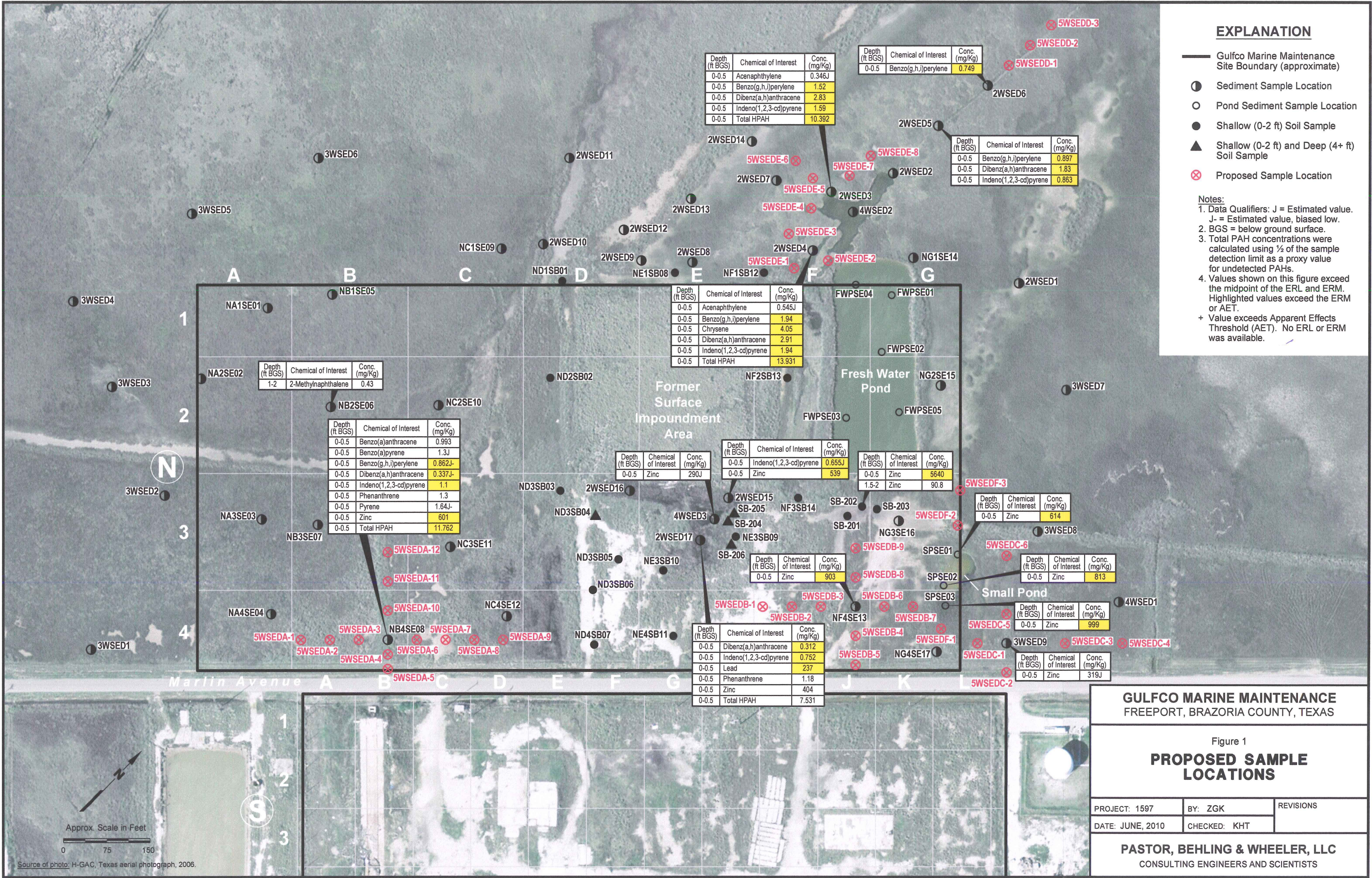
PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.
Principal Engineer

cc: Ms. Luda Voskov - Texas Commission on Environmental Quality
Mr. Brent Murray – Environmental Quality, Inc.
Mr. Ray Merrell – Sequa Corporation
Mr. Donnie Belote – The Dow Chemical Company
Mr. Allen Daniels - LDL Coastal Limited, LP
Mr. F. William Mahley - Strasburger & Price, LLP
Mr. James C. Morris III - Thompson & Knight, LLP
Ms. Elizabeth Webb - Thompson & Knight, LLP

FIGURE



EXPLANATION

- Gulfco Marine Maintenance Site Boundary (approximate)
- Sediment Sample Location
- Pond Sediment Sample Location
- Shallow (0-2 ft) Soil Sample
- ▲ Shallow (0-2 ft) and Deep (4+ ft) Soil Sample
- ⊗ Proposed Sample Location

Notes:
1. Data Qualifiers: J = Estimated value.
J- = Estimated value, biased low.
2. BGS = below ground surface.
3. Total PAH concentrations were calculated using 1/2 of the sample detection limit as a proxy value for undetected PAHs.
4. Values shown on this figure exceed the midpoint of the ERL and ERM. Highlighted values exceed the ERM or AET.
+ Value exceeds Apparent Effects Threshold (AET). No ERL or ERM was available.

GULFCO MARINE MAINTENANCE
FREEPORT, BRAZORIA COUNTY, TEXAS

Figure 1
**PROPOSED SAMPLE
LOCATIONS**

PROJECT: 1597	BY: ZGK	REVISIONS
DATE: JUNE, 2010	CHECKED: KHT	

PASTOR, BEHLING & WHEELER, LLC
CONSULTING ENGINEERS AND SCIENTISTS

TABLES

TABLE 1 - ANTICIPATED INITIAL SAMPLE ANALYSES

Sample Location(s)	Analytical Parameter
5WSEDA-3 5WSEDA-4 5WSEDA-6 5WSEDA-10	PAHs ¹ , Zinc
5WSEDB-3 5WSEDB-4 5WSEDB-6 5WSEDB-8	Zinc
5WSEDC-1 5WSEDC-2 5WSEDC-3 5WSEDC-5	Zinc
5WSEDD-1	Benzo(g,h,i)perylene
5WSEDE-1 5WSEDE-2 5WSEDE-3 5WSEDE-4 5WSEDE-5 5WSEDE-7	PAHs ¹
5WSEDF-1 5WSEDF-2	Zinc

Notes:

(1) Includes all polynuclear aromatic hydrocarbons (PAHs) previously detected in at least one wetland sediment sample at a concentration greater than the midpoint between its Effects Range Low (ERL) and Effects Range Medium (ERM) values, and all PAHs included on the list of high molecular weight PAHs (HPAH) as defined in Table 3-3 of TCEQ Ecological Risk Guidance (RG-263). See Table 2.

(2) Sample analyses and locations subject to change based on field XRF measurements and/or field observations. Additional samples analyses may be performed based on the results of initial analyses.

TABLE 2 - PROPOSED POLYNUCLEAR AROMATIC HYDROCARBON ANALYTE LIST

Analyte	CAS No.
2-Methylnaphthalene	91-57-6
Acenaphthylene	208-96-8
Benzo(a)anthracene	56-55-3
Benzo(a)pyrene	50-32-8
Benzo(g,h,i)perylene	191-24-2
Chrysene	218-01-9
Dibenz(a,h)anthracene	53-70-3
Fluoranthene	206-44-0
Indeno(1,2,3-cd)pyrene	193-39-5
Phenanthrene	85-01-8
Pyrene	129-00-0

Note:

¹Polynuclear Aromatic Hydrocarbon (PAH) analyses by EPA Method 8270C.